

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS

UNITED STATES OF AMERICA,)
)
)
Plaintiff,)
) CRIMINAL NO. 18-30095-MJR
)
vs.)
)
WILLIAM L. ISAAC,)
)
)
Defendant.)

GOVERNMENT'S NOTICE OF FACTUAL BASIS FOR THE GUILTY PLEA

If this case had proceeded to trial, the Government would have proven the following beyond a reasonable doubt:

1. During a nationwide investigation of three (3) websites, two (2) of which were Neat Chat and Uploadpie, the FBI, operating in an undercover capacity, captured screenshots and other activity involving IP addresses that were later traced to William L. Isaac in O'Fallon, Illinois, within the Southern District of Illinois. The screenshots and other activity involved the defendant sharing child pornography on the Neat Chat website.

2. On August 28, 2014, the defendant, using Uploadpie, uploaded five (5) links to child pornography to the website Neat Chat using the screenname "strippy1," thereby distributing the child pornography via the internet, a facility of interstate commerce.

3. On December 4, 2014, the defendant, again using Uploadpie, uploaded four (4) links to child pornography to the website Neat Chat using the screenname "littlelvr," thereby distributing the child pornography via the internet, a facility of interstate commerce.

4. On September 6, 2017, the defendant provided a voluntary, audiotaped statement. During the statement, the defendant indicated that he “vaguely remembered” using Neat Chat, that he remembered using the screenname “strippy1,” but did not remember using the screenname “littlelvr.” The defendant indicated that he used services like Neat Chat in late 2014 or early 2015. The defendant also admitted uploading images and videos of child pornography to chat groups such as Neat Chat. The defendant stated that he continued to go online, search for, and view child pornography using the “dark web.” He said that he does so approximately once a month. The defendant admitted being on one of the child pornography websites the morning of the interview. He stated that he preferred to download pictures of girls between 10 and 12 years of age.

5. A forensic review of the defendant’s desktop computer, a HP All-in-One PC, bearing serial number 2MD55003KW, with a 500GB Seagate hard drive, bearing serial number W3TNEXEQ, revealed 67 video files of child pornography present on the computer and corresponding hard drive. The video files had been received via the internet, a facility of interstate commerce, between on or about July 29, 2017, and on or about September 6, 2017, in O’Fallon, Illinois, within the Southern District of Illinois.

6. This notice of factual basis is intended only to provide the Court with a sufficient foundation to accept the defendant's guilty plea and is not necessarily an exhaustive account of the defendant's criminal activity.

Respectfully submitted,

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United States Attorney

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CERTIFICATE OF SERVICE

I hereby certify that on January 2, 2019, I electronically filed the **Government's Notice of Factual Basis for the Guilty Plea** with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following:

Murray A. Marks, Esq.

Respectfully submitted,

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